

EXHIBIT 16

From: Knudson, Jacquelyn Swanner
Sent: Friday, February 12, 2021 8:11 AM
To: donald@creadorelawfirm.com
Cc: McClammy, James I.; Scott R. Bickford; Kent Robbins
Subject: RE: RE:19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY

Don,

Following up on your prior request for birth mother information. We ran 30 birth mother names through Purdue's adverse event (AE) database and got 0 hits. We understand that this is only a sample of the thousands of birth mother names we received from Prime Clerk, and there is a chance that a birth mother name for one of your other clients might be in the AE database. Before we undertake the effort of searching the database for additional names, however, we want to be sure that any information we find can be disclosed. As discussed, the AE database contains personally identifying information and protected health information, so we need to make sure we have HIPAA releases from those individuals. We want to be sure that before we undertake the expense and effort of this exercise that the information can, in fact, be shared with you.

As to your second request regarding the Central Repository, we think it would be helpful to discuss your particular questions. Unfortunately, Friday, February 12 at 2 p.m. does not work for us. We are available Tuesday, February 16, 1-3 p.m. or 4-5 p.m., or Wednesday, February 17, Noon-3:30 p.m. Please let us know if one of those times work for you, and we will put something on the calendar.

Best,
Jacquelyn

Jacquelyn Swanner Knudson

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From: donald@creadorelawfirm.com <donald@creadorelawfirm.com>
Sent: Thursday, February 11, 2021 6:18 PM
To: Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>
Cc: McClammy, James I. <james.mcclammy@davispolk.com>; Scott R. Bickford <srb@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>
Subject: RE:19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY

Jacquelyn, Jim-
Friendly reminder. We are available.
Kindly respond.
Many thanks,
Don

-----Original Message-----

From: "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>
Sent: Wednesday, February 10, 2021 1:01pm
To: "donald@creadorelawfirm.com" <donald@creadorelawfirm.com>, "McClammy, James I." <james.mcclammy@davispolk.com>
Cc: "Scott R. Bickford" <srb@mbfirm.com>, "Kent Robbins" <khrobbins@kentharrisonrobbins.com>
Subject: RE: CONFIDENTIAL 19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY

Don,

We are following up on your inquiry and coordinating schedules with co-counsel (Dechert and Wiggin) for the meet and confer. We will revert as soon as possible.

Best,
Jacquelyn

Jacquelyn Swanner Knudson

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From: donald@creadorelawfirm.com <donald@creadorelawfirm.com>
Sent: Wednesday, February 10, 2021 12:27 PM
To: McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>
Cc: don creadore <Donald@creadorelawfirm.com>; Scott R. Bickford <srb@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>
Subject: CONFIDENTIAL 19-CV-23649 REQUEST FOR MEET AND CONFER RE: CENTRAL REPOSITORY

Hello Jacquelyn, Jim,

We are in need of details from the Debtors regarding the Central Repository Stamford, CT.

(As, for example, in the following entry:

Central Repository Stamford, CT: Vol 105, VIII. Clinical Data: Integrated Summary of Safety: June 2002 Periodic Safety Update Report Oxycodone Hydrochloride Preparations; 13-Oct-01 through 12-April-02.)

Does the Central Repository maintain, among other materials, pre-clinical, clinical, GLP and non-GLP information regarding opioids, Oxycodone, Oxycodone Hydrochloride preparations, or genotoxic data and genotoxicity databases? If yes, is there a directory, registry, an index, or similar document listing the contents of the Central Repository? If yes, please furnish a copy of the index, or directory (or similar), or portions relevant to our requests for--only by way of example-- non-GLP, GLP, pre-clinical and clinical toxicology animal studies; genotoxicity databases; chromosomal aberrations, in addition to the express request above (underlined). The foregoing questions were presented to the IACs and, in response, it was explained, in sum and substance, that the IACs are unable to share any knowledge or assistance.

We are proposing a meet and confer for Friday, February 12, 2021, @ 2p est; kindly advise of your availability.

Don

o/b/o Purdue NAS Children Ad Hoc

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